

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Chapter 13
Kimberly and John Henley St. Omer	:	
	:	
Debtors	:	Case No.: 16-14366

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtors, by and through their undersigned counsel, hereby moves this Honorable Court to modify the confirmed Chapter 13 Plan and in support thereof avers as follows:

1. Kimberly and John Henley St. Omer, hereinafter referred to as "Debtors" filed a Voluntary Chapter 13 Bankruptcy Petition on or about June 17, 2016.
2. The subject Chapter 13 filing was assigned case number 16-14366.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about January 12, 2017.
4. On or about August 1, 2017 the Chapter 13 Trustee filed a Motion to dismiss the instant case for failure to make regular and monthly trustee payments.
5. The Debtors fell behind on Chapter 13 trustee payments because in or about September, 2017 the Debtors moved to Severn, Maryland to pursue employment opportunities.
6. The Debtors are currently both gainfully employed, however they underestimated the costs of moving a family of five to a different state.
7. The Debtors are seeking to cure the delinquency due and owing to the Chapter 13 Trustee through the instant Modified Plan without reducing the base amount of the Plan.

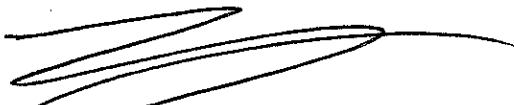
8. Accordingly, the Modified Chapter 13 Plan, filed contemporaneously herewith is attached as **Exhibit "A."**

9. The modified Chapter 13 Plan increases the Debtors Plan payments to \$1,214.00 in effort to cure the \$4,066.00 delinquency over the remaining 45 months of the Plan.

10. In accordance with the amended schedules "I" and "J" filed contemporaneously herewith, said increase in Plan payments is affordable to the Debtors.

WHEREFORE, the Debtors request that they be permitted to modify the Chapter 13 for the foregoing reasons.

Dated: September 18, 2017



Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek and Cooper
1315 Walnut Street, #502
The Philadelphia Building
Philadelphia, PA 19107
215-545-0008